

REQUEST FOR ACTION

To: Zoe Heller
Director

From: Clark Williams
Branch Chief, Statewide Technical and Analytical Resources
Branch

Request Date: December 5, 2024

Decision Subject: Consideration of The Drug Takeback Solutions Foundation's
Revised 2023 Annual Report for Covered Drugs

Action By: December 26, 2024

Summary of Request

The Drug Takeback Solutions Foundation (The Foundation) submitted its revised 2023 annual report, titled, *The Drug Takeback Solutions Foundation State of California Stewardship Plan for Covered Drugs 2023 Annual Report (Revised 2023 Annual Report)* on September 27, 2024. This Request for Action presents a summary of staff's analysis regarding The Foundation's *Revised 2023 Annual Report* and The Foundation's covered drugs stewardship program.

Background

The Foundation is a stewardship organization that, as reported in its *Revised 2023 Annual Report*, represents 87 covered entities under its approved stewardship plan for covered drugs, titled, *Stewardship Plan for Covered Drugs (Plan)*. Public Resources Code (PRC) section 42033.2(a)(1) states that, on or before March 31, 2022, and each year thereafter, a program operator shall submit to the Department of Resources Recycling and Recovery (CalRecycle) a report that describes the stewardship program activities during the previous reporting period of one year. The Foundation submitted its 2023 annual report, titled, *The Drug Takeback Solutions Foundation State of California Stewardship Plan for Covered Drugs 2023 Annual Report (2023 Annual Report)* on March 29, 2024. CalRecycle determined the *2023 Annual Report* was complete and notified The Foundation on April 29, 2024, pursuant to PRC section 42033.2(d)(1) and Title 14 of the California Code of Regulations (14 CCR) section 18973.1(b). On June 27, 2024, CalRecycle disapproved The Foundation's *2023 Annual Report* in the Request for Action (RFA), titled, *Consideration of The Drug Takeback Solutions Foundation's 2023 Annual Report for Covered Drugs (June 2024 RFA)*. On July 29, 2024, CalRecycle issued a notice to The Foundation, titled, *Notice Regarding Disapproval of The Drug Takeback Solutions Foundation's 2023 Annual Report for Covered Drugs (July 2024 Notice)*. The Foundation was required to revise and resubmit its 2023 annual report within 60 days of receipt of the *July 2024 Notice* (i.e., by September 27, 2024), to address the deficiencies identified in the *June 2024 RFA* and meet the requirements identified in the *July 2024 Notice*.

On September 27, 2024, The Foundation submitted its *Revised 2023 Annual Report*, which is the subject of this RFA. CalRecycle has 90 days to approve, disapprove, or conditionally approve the *Revised 2023 Annual Report* pursuant to PRC section 42033.2(d)(2) and 14 CCR section 18973.1.

The purpose of this RFA is to examine whether The Foundation has corrected the requirements noted as unmet in its previous submission and to identify, to the extent feasible, aspects of non-compliance that might be apparent from the revised annual report. Director decisions on annual reports do not necessarily impact actions taken by CalRecycle's Waste Permitting, Compliance, and Mitigation Division or its independent Office of Audits. Furthermore, nothing in this RFA hinders CalRecycle's right to pursue enforcement actions for instances of non-compliance identified through other means, such as field inspections, nor does it affect CalRecycle's authority to conduct its own audits of The Foundation, including a review of the independent certified public accountant audit, for compliance with statute and regulations and consistency with the program operator's stewardship plan, annual report, and annual program budget pursuant to PRC section 42033.4(b)(3).

Staff Analysis

Staff evaluated The Foundation's *Revised 2023 Annual Report* to determine whether the requirements of statute, regulations, and The Foundation's *Plan* were met, as reported by The Foundation, as directed in the *June 2024 RFA* and *July 2024 Notice*. The sections below present a summary of staff's analysis of The Foundation's *Revised 2023 Annual Report* and select components of its covered drugs stewardship program.

CalRecycle requested that The Foundation explain its revisions so that CalRecycle can better understand why the information provided in the revised annual report is correct. In numerous instances, The Foundation declined to explain the change or provided an explanation that failed to give the reader confidence that the revised information was correct. CalRecycle did not find any requirement unmet solely because of the inadequacy of the explanation; however, it does give CalRecycle reason for concern.

Convenience Standard – Authorized Collection Sites

The *June 2024 RFA* and *July 2024 Notice* explained that The Foundation's *2023 Annual Report* demonstrated it did not meet the required number of authorized collection sites to meet the convenience standard. The Foundation was invited to provide the department with information to demonstrate CalRecycle was incorrect in that determination. The Foundation did not provide any additional information to cure the deficiency.

Convenience Standard – Reasonable Geographic Spread

Requirement: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirement pursuant to PRC section 42032.2(a)(1)(F)(ii) and 14 CCR section 18973.4(c)(3).

1. Provide a description of how the reasonable geographic spread of authorized collection sites stated in The Foundation's approved plan was met and for which counties it was met. If reasonable geographic spread was not met,

include the counties where it was not met and a description of efforts made to achieve compliance, pursuant to 14 CCR section 18973.4(c)(3).

Analysis: Requirement 1 Not Met

PRC section 42032.2(a)(1)(F)(ii) requires a program operator to provide for a reasonable geographic spread of authorized collection sites and an explanation for the geographic spread. The Foundation's approved *Plan* states that The Foundation will "ensure that at least 90[percent] of Ultimate Users live within a 15-mile drive of an Authorized Collection Site or a Mail-Back Distribution Site in counties where an authorized Retail Pharmacy is not available." The *2023 Annual Report* did not include an analysis of reasonable geographic spread for any of the counties in which the *Plan* operates. In the *Revised 2023 Annual Report*, The Foundation states that at least 90 percent of ultimate users in 23 counties live within a 15-mile drive of an authorized collection site or mail-back distribution site. "Appendix D" includes a map and a list of each county and the percentage of ultimate users within that county that live within a 15-mile drive of an authorized collection site or mail-back distribution site. The Foundation states that in counties where the reasonable geographic spread was not met, it made efforts to contact potential authorized collectors and establish addition authorized collection sites.

The Foundation's *Plan* states it will establish authorized collection receptacles to ensure a reasonable geographic spread where "90[percent] of Ultimate Users live within a 15-mile drive of an Authorized Collection Site or a Mail-back Distribution Site **in counties where an authorized Retail Pharmacy is not available**" (emphasis added). The Foundation's *Revised 2023 Annual Report* states it analyzed whether "90[percent] of Ultimate Users ... live within a 15-mile drive of an Authorized Collection Site or Mail-Back Distribution Site." It appears that The Foundation counted all established mail-back distribution locations towards reasonable geographic spread in all counties, not just in counties where "an authorized Retail Pharmacy is not available." It is unclear how the reasonable geographic spread calculation utilized in the *Revised 2023 Annual Report* is consistent with The Foundation's *Plan*. Regardless, The Foundation did not meet reasonable geographic spread in all counties. Although The Foundation provided a description and analysis of reasonable geographic spread in the *Revised 2023 Annual Report*, requirement 1 remains unmet, pursuant to PRC section 42032.2(a)(1)(F)(ii) and The Foundation's approved *Plan*.

Transportation and Disposal

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973.4(d) and 18973.4(k).

2. Provide the name, mailing and physical address, and the total weight of covered drugs disposed for each disposal facility pursuant to 14 CCR section 18973.4(d)(3).
3. Clarify whether The Foundation added a new disposal facility in 2023 and, if so, provide the required information pursuant to 14 CCR section 18973.4(d).

- a. If applicable, provide a description and evaluation of the process that was used for selecting the new service provider pursuant to 14 CCR section 18973.4(k).

Analysis: Requirements 2 and 3 Met

The Foundation's *2023 Annual Report* included *Attachment C Service Providers (Attachment C)* which listed the name, mailing address, and physical address of its disposal facilities. *Attachment C* listed two "123 Compliant Logistics" disposal facilities, one in Arizona and the other in Massachusetts. *Attachment D, Weights by Disposal Facility (Attachment D)* included the weight of covered drugs disposed at four facilities and listed "123 Compliant Logistics" as disposing of 96.0 pounds of covered drugs. It was unclear whether this was the Arizona or Massachusetts facility. In the *Revised 2023 Annual Report*, instead of clarifying which "123 Compliant Logistics" location was utilized, The Foundation replaced "123 Compliant Logistics" in *Attachment D* with "GRP & ASSOCIATES, INC." The name, mailing and physical addresses, and total weight of covered drugs disposed for each facility is included, therefore, The Foundation met requirement 2. However, The Foundation does not explain why it replaced the disposal facility listed in the initial submission with a completely different disposal facility in the revised submission, other than noting that *Attachment D* was updated "to reflect accurate disposal information." This type of change makes it unclear whether The Foundation is able to accurately track and report the disposal of covered drugs.

On January 19, 2024, The Foundation notified CalRecycle of a new disposal facility and, although the notification did not occur in 2023, The Foundation stated, "This information will also be included as part of The Foundation's Annual Report, to be submitted in March 2024." In the *2023 Annual Report*, submitted March 29, 2024, The Foundation did not state it added or changed any service providers in 2023, and the new disposal facility mentioned in The Foundation's January 19, 2024, email, *Barron County Waste to Energy and Recycling Facility*, was not included in *Attachment C*. In the *Revised 2023 Annual Report*, The Foundation clarified that it did not add any new disposal facilities in 2023. Regarding the notification that occurred on January 19, 2024, The Foundation states that "although the Foundation notified CalRecycle in 2023, the Disposal Facility was not used in 2023. Accordingly, the Foundation will report on this Disposal Facility in its 2024 Annual Report." CalRecycle notes that this notification occurred in 2024 (not 2023), and that we anticipate seeing information about this new service provider in The Foundation's 2024 annual report. The Foundation met requirement 3.

Education and Outreach

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973.2(j)(5), 18973.4(i), 18973.1(a), and 18973(d).

4. Clarify any discrepancies among reported metrics pursuant to 14 CCR sections 18973.4(i)(2), 18973.1(a), and 18973(d). The correct number should be identified along with the reason that this number is the correct number; the reason the incorrect number was initially provided should also be noted.

5. Include a discussion of what the metrics, including the survey results, reveal about the performance of the comprehensive education and outreach program, including, but not limited to, ultimate user awareness, program usage, and accessibility pursuant to 14 CCR sections 18973.2(j)(5) and 18973.4(i). Describe how The Foundation will use the results to improve the program in accordance with its approved plan.
6. Clarify whether the “provider” survey was completed by pharmacists and healthcare professionals, in accordance with The Foundation’s approved plan. Clarify how the survey was conducted and the methods of contact pursuant to The Foundation’s approved plan and 14 CCR section 18973.1(a).
7. Provide the questions The Foundation used for its survey of providers and ultimate users pursuant to 14 CCR section 18973.1(a).

Analysis: Requirements 4, 5, 6, and 7 Met

In the *2023 Annual Report*, there were discrepancies in the reported metrics for newspaper advertisements. The Foundation stated that it ran advertisements in three newspapers and “garnered a total of 2,024,148 impressions, meaning that 2,024,148 readers were served the advertisement.” However, elsewhere in the *2023 Annual Report* it stated that there were 135,957 impressions with a frequency of “nine” and in another location that there were 4,048,296 impressions among three newspapers and 18 insertions. In the *Revised 2023 Annual Report*, The Foundation explains that the correct number of impressions is 2,024,148, which was calculated from the number of newspapers circulated on the days when the advertisements were included and clarifies that discrepancies were the result of human error. Therefore, The Foundation met requirement 4.

In the *2023 Annual Report*, The Foundation provided the results from the survey it conducted, but did not discuss what the results revealed about the performance of the education and outreach program or describe how it will use the results to improve the program. In the *Revised 2023 Annual Report*, The Foundation states it interpreted the survey results and identified three areas of focus: (1) increasing Program awareness, (2) education regarding risks of improper disposal, and (3) education on Program importance. The Foundation describes the steps it plans to take to address the areas of concern it identified through interpretation of the survey results, which includes increasing the number of advertisements, improving promotional materials regarding improper disposal implications, and conducting a direct mail campaign to healthcare providers. Therefore, The Foundation met requirement 5.

In the *2023 Annual Report*, The Foundation stated that it conducted a survey of 1,000 ultimate users and 500 “providers” but did not define “providers,” making it unclear whether the survey was of “pharmacists, and healthcare professionals in the State of California who interact with Ultimate Users” as stated in The Foundation’s approved *Plan*. In the *Revised 2023 Annual Report*, The Foundation clarifies that the “provider” survey was of “healthcare providers, including doctors, nurses, nurse practitioners, physician assistants, pharmacists, pharmacy technicians, dentists and

other healthcare professionals that interact with Ultimate Users.” The Foundation also included information in the *Revised 2023 Annual Report* about how the survey was conducted. The Foundation administered two surveys through a company called Pollfish, which “advertised and distributed the surveys through over 120,000 partnered applications and websites such as social media, weather, and news applications.” Therefore, The Foundation met requirement 6.

In the *2023 Annual Report*, The Foundation stated that residents and providers were asked the same survey questions. In the *July 2024 Notice*, CalRecycle requested that The Foundation provide the list of questions that were included in this survey. In the *Revised 2023 Annual Report*, The Foundation provided the survey questions and results in Appendix C. Therefore, The Foundation met requirement 7. However, The Foundation removed language in the *Revised 2023 Annual Report* stating that the surveys were the same and, based on the survey questions provided in Appendix C, it appears that ultimate users and providers were asked different questions. It is unclear why, in the initial annual report submission, The Foundation stated that “Residents were asked the same questions as providers.”

Actual Expenses for Departmental Administrative Fees

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirement pursuant to 14 CCR sections 18973.4(n), 18973.1(a), and 18973(d).

8. Include the actual expense for the departmental administrative fee or clarify why the departmental administrative fee is listed as \$2,316,503.36, pursuant to 14 CCR sections 18973.4(n), 18973.1(a), and 18973(d). If the incorrect number was initially provided, the reason why it was included initially should also be noted.

Analysis: Requirement 8 Not Met

In the *2023 Annual Report*, The Foundation listed \$2,316,503.36 in departmental administrative fees under its actual expenses incurred in 2023. In the *Revised 2023 Annual Report*, The Foundation states that the \$2,316,503.36 “reflects actual expenses incurred in 2023 based on CalRecycle invoices provided to the Foundation in 2023, which were analyzed pursuant to Generally Accepted Accounting Principles (GAAP) to project remaining 2023 expenses incurred by the Foundation related to CalRecycle administrative fees.” It remains unclear how The Foundation analyzed the amount that CalRecycle invoiced in 2023 and projected approximately \$2 million in additional expenses incurred in 2023 when this amount is significantly higher than CalRecycle’s records. Given that the total amount that CalRecycle has invoiced The Foundation’s covered drugs program from 2019 through 2024 is \$1,214,251.03, a figure significantly lower than the number provided by The Foundation for 2023 alone, the provided number is implausible. The Foundation did not meet requirement 8.

Authorized Collectors

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to 14 CCR sections 18973.4(j)(3) and 18973(d).

9. Provide all mailing and physical addresses associated with each authorized collector pursuant to 14 CCR section 18973.4(j)(3).
10. Submit a complete and correct list of authorized collectors that are located within the statewide program pursuant to 14 CCR sections 18973.4(j)(3) and 18973(d).

Analysis: Requirements 9 and 10 Met

The Foundation did not clearly indicate if the addresses listed in the list of authorized collectors were mailing addresses, physical addresses, or both in its *2023 Annual Report*. In the *Revised 2023 Annual Report*, The Foundation clarifies in *Attachment B 2023 Collection Information (Attachment B)* that “Mailing and physical addresses are the same unless otherwise indicated.” Therefore, The Foundation met requirement 9.

In the confidential supplemental collection information document of the *2023 Annual Report*, there were six authorized collectors that were not consistently included, as well as a location that appeared to be located outside of the statewide program, not in Kern County as described. In the *Revised 2023 Annual Report*, the lists of authorized collectors provided in *Attachment B* and in the confidential supplemental collection information document are the same. The authorized collector that was listed as being in Kern County, but appeared to be located outside of the statewide program, was removed from the lists. Therefore, The Foundation met requirement 10.

Collection System

Requirements: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirements pursuant to PRC section 42030(b) and 14 CCR sections 18973.4(c)(2)(A) and 18973(d).

11. Distinguish the potential authorized collectors from the mail-back distribution locations that were notified and include the location’s county pursuant to PRC section 42030(b) and 14 CCR section 18973.4(c)(2)(A).
12. Consistently report metrics for the amount of potential authorized collectors notified of the opportunity to participate in the program pursuant to 14 CCR section 18973(d).

Analysis: Requirement 11 Not Met, Requirement 12 Met

In the *2023 Annual Report*, The Foundation stated that it notified “9,655 Potential Authorized Collectors” of the opportunity to serve as an authorized collector. However, the list of potential authorized collectors notified titled, *Attachment A Potential Authorized Collectors Notified (Attachment A)*, encompassed “both potential Authorized Collectors and Mail-Back Distribution Sites.” The Foundation’s inclusion of potential mail-back distribution locations made it difficult to distinguish which of the contacts listed were potential authorized collectors as opposed to mail-back distribution locations. Additionally, several of the contacts listed did not specify a county. In the *Revised 2023 Annual Report*, The Foundation states it notified 5,460

potential authorized collectors of the opportunity to serve as an authorized collector. The Foundation states that it removed potential mail-back distribution locations from *Attachment A*, and all locations listed include a county.

However, *Attachment A* still lists a variety of types of locations that may not fall under the definition of “Authorized Collector,” pursuant to PRC section 42030(b). This includes elementary schools, retirement communities, skilled nursing facilities, intermediate care facilities, and home health services. In its approved *Plan*, The Foundation explains the methods it uses to identify potential authorized collection sites and lists “California-licensed Pharmacies, hospital/clinics with onsite Pharmacies who are eligible in accordance with the DEA Rule as Authorized Collectors and licensed in good standing with the State Board ... and qualified law enforcement agencies” as potential authorized collectors. Although The Foundation states it removed potential mail-back distribution sites from the list of potential authorized collectors to address the requirement, The Foundation appears to have inaccurately identified locations that can serve as authorized collectors. Therefore, The Foundation did not meet requirement 11.

In the *Revised 2023 Annual Report*, The Foundation consistently reports that it contacted 5,460 potential authorized collectors, including the number of entities listed in *Attachment A*, and that this metric does not include potential mail-back distribution locations. Therefore, The Foundation met requirement 12.

Document Submittals

Requirement: CalRecycle required the *Revised 2023 Annual Report* to meet the following requirement pursuant to 14 CCR section 18973(d).

13. Define and utilize correct and consistent terminology and metrics within the annual report, pursuant to 14 CCR section 18973(d), in a complete and correct manner, including those discrepancies noted in the *June 2024 RFA* (e.g., items noted in the “Education and Outreach” and “Document Submittals” sections of the *June 2024 RFA*). The correct number or fact should be identified along with the reason that this number or fact is correct; if an incorrect number or fact was initially provided, the reason why it was included initially should also be noted.

Analysis: Requirement 13 Not Met

In the *Revised 2023 Annual Report*, The Foundation removed reference to an “Appendix 1 Figure 7” which did not exist in the *2023 Annual Report*.

In the *2023 Annual Report*, The Foundation used terminology related to the how the survey was conducted that was not defined or explained including, “survey application publishers,” “survey platform partners,” and “partner applications.” In the *Revised 2023 Annual Report*, The Foundation explains that the “survey administrator” is a company called Pollfish that distributed the survey through “partnered applications and websites such as social media, weather, and news applications.”

In the *Revised 2023 Annual Report*, The Foundation addressed the discrepancies between the reported number of authorized collection sites added during the reporting period by identifying the correct numbers and explaining that the incorrect reporting was due to human error. However, there are still discrepancies within the *Revised 2023 Annual Report*. The Foundation states that there were 457 authorized collection sites in the program during the reporting period, but that “six locations closed and/or disenrolled from the Program, resulting in 451 active Authorized Collection Sites.” *Attachment B* lists 457 authorized collection sites, with 449 active sites and eight closed sites. Additionally, on page 5 of the *Revised 2023 Annual Report*, The Foundation states that 44 new authorized collection sites were added but on page 9, the table listing “New Disposal Options Secured by County During the Reporting Period” totals 36 new authorized collection sites. This table also shows that 21 new mail-back distribution sites were added, while on pages 11 and 14 of the *Revised 2023 Annual Report*, The Foundation states that 27 were added. It remains unclear how many new authorized collection sites and mail-back distribution locations were added during the reporting period.

Therefore, The Foundation did not meet requirement 13.

Additionally, there are instances where The Foundation adjusted the narrative and information in its *Revised 2023 Annual Report* from what was initially provided in its *2023 Annual Report*. The Foundation did not provide an explanation for the changes, or why the information it initially provided was incorrect, making it difficult to determine what activities occurred in 2023. For example:

- The Foundation’s *2023 Annual Report Attachment D* listed “123 Compliant Logistics” as disposing of 96.0 pounds of covered drugs. However, in *Attachment D* in the *Revised 2023 Annual Report*, The Foundation replaced “123 Compliant Logistics” with “GRP & ASSOCIATES, INC.”
- In the *2023 Annual Report*, The Foundation stated that for the survey it conducted, “Residents were asked the same questions as providers.” In the *Revised 2023 Annual Report*, The Foundation removed language stating that the surveys were the same and provided the survey questions which appears to demonstrate that ultimate users and providers were asked different questions.

Staff Analysis Conclusion

Based on the information, as reported in The Foundation’s *Revised 2023 Annual Report*, The Foundation met 9 of the 13 requirements CalRecycle identified as deficient in the *June 2024 RFA* and *July 2024 Notice*. Further, The Foundation continues to demonstrate inconsistencies and a lack of clarity in its reporting. CalRecycle does not have a high level of confidence in the accuracy of The Foundation’s document submittals due to the errors described in the “Staff Analysis” section, above. CalRecycle may conduct its own audits of The Foundation, including a review of the independent certified public accountant audit, for compliance with statute and regulations and consistency with the program operator’s stewardship plan, annual report, and annual program budget pursuant to PRC section 42033.4(b)(3).

Feedback from Interested Parties

CalRecycle solicited public input on The Foundation's *Revised 2023 Annual Report* from September 30, 2024, through October 14, 2024, and did not receive any public comments.

Action

Pursuant to PRC section 42033.2(e) and 14 CCR section 18973.1, I hereby:

- Approve The Foundation's *Revised 2023 Annual Report*.
- Conditionally approve The Foundation's *Revised 2023 Annual Report*. Direct staff to identify the conditions to be met for approval and provide written notice to The Foundation within 30 days of signature of this Request for Action, pursuant to 14 CCR section 18973.1(j).
- Disapprove The Foundation's *Revised 2023 Annual Report*.

Signed by:

Zoe Heller
Director

Dated: December 23, 2024

Attachments:

The documents listed below are posted to CalRecycle's website. To request documents that are referenced in this report but are not listed below, please submit a Public Records Act request:

<https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/>.

1. [The Drug Takeback Solutions Foundation State of California Stewardship Plan for Covered Drugs 2023 Annual Report](#) (September 27, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15990>
 - a. [Attachment A – Potential Authorized Collectors Notified](#) (September 27, 2024) <https://www2.calrecycle.ca.gov/PublicNotices/Documents/15984>
 - b. [Attachment B – 2023 Collection Information](#) (September 27, 2024) <https://www2.calrecycle.ca.gov/PublicNotices/Documents/15985>
 - c. [Attachment C – Service Providers](#) (September 27, 2024) <https://www2.calrecycle.ca.gov/PublicNotices/Documents/15986>
 - d. [Attachment D – Weights by Disposal Facility](#) (September 27, 2024) <https://www2.calrecycle.ca.gov/PublicNotices/Documents/15987>
 - e. [Attachment E – Covered Entities and Product List](#) (September 27, 2024) <https://www2.calrecycle.ca.gov/PublicNotices/Documents/15989>
 - f. [Attachment F – State Agency Determinations](#) (September 27, 2024) <https://www2.calrecycle.ca.gov/PublicNotices/Documents/15988>
2. [Stewardship Plan for Covered Drugs](#) (October 15, 2022) <https://www2.calrecycle.ca.gov/Docs/Web/122445>
 - a. [Appendix A – Program Budget](#) <https://www2.calrecycle.ca.gov/Docs/Web/122424>
 - b. [Appendix B – Participating Covered Entities](#) <https://www2.calrecycle.ca.gov/Docs/Web/122427>
 - c. [Appendix C – Participating Authorized Collectors](#) <https://www2.calrecycle.ca.gov/Docs/Web/122430>

- d. [Appendix D – Service Providers](https://www2.calrecycle.ca.gov/Docs/Web/122433)
<https://www2.calrecycle.ca.gov/Docs/Web/122433>
- e. [Appendix E – Drugs Sold or Offered for Sale in California by Participating Covered Entities](https://www2.calrecycle.ca.gov/Docs/Web/122436)
<https://www2.calrecycle.ca.gov/Docs/Web/122436>
- f. [Appendix F – Contacted Potential Authorized Collectors](https://www2.calrecycle.ca.gov/Docs/Web/122439)
<https://www2.calrecycle.ca.gov/Docs/Web/122439>
- g. [Appendix G – Participating Mail-Back Distribution Locations](https://www2.calrecycle.ca.gov/Docs/Web/122442)
<https://www2.calrecycle.ca.gov/Docs/Web/122442>
- 3. [The Drug Takeback Solutions Foundation State of California Stewardship Plan for Covered Drugs 2023 Annual Report](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15684) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15684>
 - a. [Attachment A – Potential Authorized Collectors Notified](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15686) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15686>
 - b. [Attachment B – 2023 Collection Information](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15687) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15687>
 - c. [Attachment C – Service Providers](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15688) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15688>
 - d. [Attachment D – Weights by Disposal Facility](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15689) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15689>
 - e. [Attachment E – Covered Entities and Product List](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15690) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15690>
 - f. [Attachment F – State Agency Determinations](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15691) (March 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15691>
- 4. [Consideration of The Drug Takeback Solutions Foundation’s 2023 Annual Report for Covered Drugs](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15859) (June 27, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15859>
- 5. [Notice Regarding Disapproval of The Drug Takeback Solutions Foundation’s 2023 Annual Report for Covered Drugs](https://www2.calrecycle.ca.gov/PublicNotices/Documents/15880) (July 29, 2024)
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/15880>